

RECOMMENDED PROCEDURES

Documenting and Reporting Incidents of Allegedly Inflated Influenza Vaccine/Vaccination Quotes/Prices

2005-2006 Influenza Season

I. INTRODUCTION

Since 2001, the Centers for Disease Control and Prevention (CDC) has collected and documented incidents of allegedly inflated influenza vaccine/vaccination quotes/prices. The number of reports received over the last four influenza seasons has mirrored the degree of the shortage of or delay in receiving vaccine supplies. During the 2004-2005 influenza season, CDC received 106 such reports, collected additional information, and forwarded the reports to the National Association of Attorneys General, also known as NAAG, which then distributed the reports to the appropriate state Attorneys General.

The procedures for handling these reports during the 2005-2006 influenza season have been changed to increase the efficiency and timeliness of both reporting and investigation. These procedures also ensure CDC will receive a copy of all reports for National documentation and evaluation.

CDC no longer will collect additional information for reports received directly. Rather, for the 2005-2006 influenza season, CDC will document whatever information is received on the ***Official Report Form for Documenting and Reporting Incidents of Allegedly Inflated Influenza Vaccine/Vaccination Quotes/Prices***. This Official Report Form is referenced throughout the remainder of this document as the "ORF". CDC promptly will email these forms to the appropriate State Immunization Programs (SIPs). The SIPs will obtain additional information if indicated then forward the completed ORF to their State Attorneys General. The SIPs also are likely to receive initial reports directly.

Enter on an ORF all information received by SIPs from CDC, local health care providers, and other entities. Obtain additional information if indicated and email the ORF to both the SIP's State Attorneys General and to CDC.

At the close of each influenza season, CDC will evaluate the data from all states and prepare a report to be shared with the SIPs and other stakeholders. These procedures place the primary responsibility for managing these reports with the SIPs so as to improve timeliness and efficiency.

The following procedures provide: 1) a recommended script for use when reports are received; and 2) instructions regarding the use and submission of the ORF.

II. **RECOMMENDED SCRIPT FOR ENTITIES RECEIVING REPORTS**

"You are contacting us because you either are a:

- A) Health care provider, organization or other entity receiving an allegedly inflated quote for influenza vaccine from a Vaccine Vendor; or*
- B) A consumer who feels you paid too much for an influenza vaccination at a Physician's Office or a Clinic.*

We will need some information so your report can be followed-up by the appropriate authorities. The information you are providing will be used to keep an accurate record of your complaint. Furnishing the information is voluntary, but also important because this information allows public health problems, like the one you are reporting, to be investigated appropriately.

Consumer complaints, such as yours regarding an allegedly inflated influenza vaccine quote or allegedly influenza vaccination price, assist State Attorneys General in identifying problem areas and potential violations of state consumer protection laws. State Attorneys General also may take enforcement action against companies conducting unlawful business practices involving consumers.

Your report, including your name, phone number and email address, will be provided to: 1) the Centers for Disease Control and Prevention; 2) the State Immunization Program in both your state and the state where the alleged offender is located (if different); 3) the Attorneys General in both your state and the state where the alleged offender is located (if different from the report state); and 4) the National Association of Attorneys General."

III. **INSTRUCTIONS FOR THE USE AND SUBMISSION OF THE ORF**

When a call or email reporting an incident of an allegedly inflated influenza vaccine/vaccination quote/price is received, record the information on an ORF.

The following instructions were written for the three entities most likely to receive initial reports (local health care providers and other entities including local health departments, state immunization programs, and CDC).

A) LOCAL HEALTH CARE PROVIDERS AND OTHER ENTITIES (including local health departments)

When a public or private local health care provider or other entity (***including a local health department***) receives a report of an alleged incident, they should take the following two steps.

- 1)** Document all information on an ORF. Obtain additional information if indicated.
- 2)** Submit the completed ORF to your State Immunization Program.

Note: To obtain a copy of the ORF or to determine how to submit this form upon completion, call or email the appropriate SIP. Links to State Immunization Program web sites can be found at the following: <http://www.immunize.org/states/index.htm>. Scroll down to and click on the desired state, then browse to find the desired phone number or email address. The ORF also may be obtained by contacting Jim Harrison at CDC (Phone: 404-639-8250; Fax: 404-639-8627; or email: jrh3@CDC.gov.)

B) STATE IMMUNIZATION PROGRAMS (SIPs)

1) Obtaining Information and Use of the ORF

a) Initial Information is provided on an ORF

When an SIP receives an ORF, check to verify all information is included. Obtain additional information if indicated.

b) Initial Information is NOT provided on an ORF

When a State Immunization Program receives a telephone call, email, letter or fax of an alleged incident, but the information is not provided on an ORF, they should transfer the provided information to an ORF and obtain additional information if indicated.

2) Submitting the ORF

Submit the completed ORF to:

- The State Attorney General;
- The State Immunization Program in the state where the alleged offender is located¹ (if different from the report state); and
- CDC (Contact Jim Harrison (Email: jrh3@CDC.gov; Fax: 404-639-8627).

Note: To find the Attorney General for a state, use the internet to visit the website of the National Association of Attorneys General at www.naag.org. Scroll down to the "Find Your Attorney General" text box in the center, light blue column. Click on the down arrow to find and select the Attorney General for the desired state.

C) THE CENTERS FOR DISEASE CONTROL AND PREVENTION (CDC)

1) When a report of an alleged incident is initially received by CDC, the information will be handled as follows.

- a)** Enter the information on an ORF (if not already submitted on this form);
- b)** Promptly email to the SIP in both the state from which the report was submitted and the state where the alleged offender is located (if different from the report state);
- c)** Enter the information on CDC's National Tracking Spreadsheet; and
- d)** Email the ORF to the National Association for Attorneys General.

2) If the report is received by CDC directly from an SIP on an ORF, the information will be handled as follows.

- a)** Document the information on CDC's National Tracking Spreadsheet; and
- b)** Email the ORF to the National Association for Attorneys General.

¹ Once ORFs are completed by an SIP, they should be sent to the SIP in the state in which the alleged offender is located (if different from the report state). This is so that SIPs in both states can then forward copies on to their respective Attorneys General. Note there is a place to check this off at the bottom of the ORF.